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July 20, 2018

VIA ECF

Honorable Leda D. Wettre, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room 4015
Newark, New Jersey 07101

Re: *Trzaska v. L'Oréal USA, Inc. and L'Oréal, S.A.*
Civil Action No. 2:15-cv-02713-SDW-SCM

Dear Magistrate Judge Wettre:

We represent L'Oréal, S.A. in the above matter and write, as directed by Paragraph 7 of the Court's April 26, 2018 Amended Pretrial Scheduling Order and in advance of the telephone status conference scheduled for July 25, 2018.

The parties are proceeding with paper discovery and per agreement, the due dates for answers to interrogatories and document requests by all parties were adjourned to July 25, 2018. Plaintiff's deposition had originally been noticed for July 9, 2018. The examination has been adjourned by agreement, but plaintiff has not offered any new dates. This week, Plaintiff has issued a subpoena for the deposition of Patricia Rocha, a former employee of L'Oréal USA, Inc. for August 14, 2018. Plaintiff has not issued any deposition notices to L'Oréal, S.A.

Plaintiff's counsel has inquired about whether three potential witnesses from L'Oréal, S.A. would be coming to the United States in September or October and, if so, the possibility of deposing them in New Jersey. None of the potential witnesses, Jean-Francois Pahin, Denis Boulard and Laurent Attal, all of whom live and work in France, will be in the United States at that time. In any event, we object to those depositions taking place in the United States. As was discussed at the initial discovery conference, it is L'Oréal, S.A.'s position that those depositions should take place in France. We further object to any deposition of Mr. Laurent Attal, Executive Vice President Research and Innovation and member of the Executive Committee, whether in France or in the United States, because he has no unique personal knowledge of the issues in dispute, which can be obtained from other witnesses, and, regardless of location, would pose a severe hardship to the company in light of Mr. Laurent Attal's roles and responsibilities at L'Oréal, S.A.

Honorable Leda D. Wettre, U.S.M.J.
July 20, 2018
Page 2

We remain available for any questions that Your Honor may have in advance of the conference.

Respectfully submitted,

/s/ Eric A. Savage

Eric A. Savage

EAS/msl

cc: All counsel of record (via ECF)

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